

# **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

|   |                                       |
|---|---------------------------------------|
| In re Terrorist Attacks on September 11, 2001   | 03-md-1570 (GBD)(SN)<br><br>ECF Case  |
| This document relates to:<br><br><i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i> | 15-cv-9903 (GBD) (SN)<br><br>ECF Case |

**DECLARATION OF YVONNE VERONICA ABDOOL**

I, Yvonne Veronica Abdool, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present at the World Trade Center when the terrorist attacks of the World Trade Center Towers occurred.

4. I was employed by Frankel & Co., Inc. which had offices located on the thirty-sixth floor of the World Trade Center Tower Two.

5. I was at work and in Tower Two when the attacks began. I fled the building and upon my exit of the building, I fell and injured my left knee.

6. As a result of the terrorist attacks, I suffered the following specific injuries on September 11, 2001: left knee injury.

7. As a result of my injuries, I was unable to continue to work.

8. I sought medical attention for my physical injuries: my left knee. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received for my physical injuries caused by the September 11, 2001 terrorist attacks.

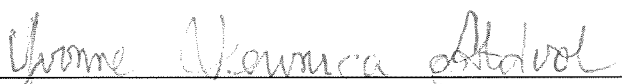
9. My physical distress continues to this day. I have had a number of procedures over the years to my left knee: arthroscopic surgery on November 30, 2001 and a left knee uni-compartmental replacement on August 20, 2003. After the second surgery, I was diagnosed as having Reflex Sympathetic Dystrophy "RSD" and in order to treat that have undergone multiple stellate ganglion block treatments with varying results.

9. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I was diagnosed with and treated for Post-Traumatic Stress Syndrome because of what I personally experienced and witnessed on September 11, 2001.

10. I previously pursued a claim (VCF 1 Claim Number Unknown) through the September 11<sup>th</sup> Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be eligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 24 day of January, 2020.

  
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Signature of Declarant, Yvonne Veronica Abdool

# **Exhibits Filed Under Seal**